

1 Laura Vartain Horn (SBN 258485)  
2 **KIRKLAND & ELLIS LLP**  
3 555 California Street, Suite 2700  
4 San Francisco, CA 94104  
5 Telephone: (415) 439-1625  
6 laura.vartain@kirkland.com

7 Allison M. Brown (Admitted *Pro Hac Vice*)  
8 **KIRKLAND & ELLIS LLP**  
9 2005 Market Street, Suite 1000  
10 Philadelphia, PA 19103  
11 Telephone: (215) 268-5000  
12 alli.brown@kirkland.com

13 Jessica Davidson (Admitted *Pro Hac Vice*)  
14 **KIRKLAND & ELLIS LLP**  
15 601 Lexington Avenue  
16 New York, NY 10022  
17 Telephone: (212) 446-4800  
18 jessica.davidson@kirkland.com

19 *Attorneys for Defendants*  
20 UBER TECHNOLOGIES, INC., RASIER, LLC,  
21 And RASIER-CA, LLC  
22 [Additional Counsel Listed on Signature Page]

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:

*Jaylynn Dean v. Uber Technologies,  
Inc., et al., No. 3:23-cv-06708*

**DEFENDANTS' AMENDED  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Defendants hereby move the Court to consider whether certain materials should be sealed. Defendants file these materials under seal because they have been produced and marked confidential, contain references to documents produced and marked confidential by Plaintiffs, or Plaintiffs have otherwise requested that they be maintained under seal.

Specifically, Defendants file this amended motion at Plaintiffs' request to seal documents or portions thereof that Plaintiffs believe should be sealed. Defendants do not oppose Plaintiffs' request to seal those materials.

**Material To Be Filed Under Seal**

The materials to be filed under seal are certain exhibits in Support of Defendants' contemporaneously-filed Motion for Partial Summary Judgment. Defendants respectfully ask the Court to consider whether the following should be filed under seal:

Document	Description	Designating Party
<b>Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Motion containing name of third-party witness, S.M.	Sealed at Plaintiffs' request
<b>Declaration of Johnathan Schneller in Support of Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Declaration containing name of third-party witness, S.M.	Sealed at Plaintiffs' request
<b>Exhibit 6 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Bruce Weiner dated September 26, 2025, marked as Confidential.	Plaintiffs
<b>Exhibit 8 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of June 27, 2025 deposition of Plaintiff Jaylynn Dean.	Sealed at Plaintiffs' request
<b>Exhibit 9 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of July 22, 2025 deposition of third-party witness S.M., marked as Highly Confidential – Attorneys' Eyes Only.	Plaintiffs

Document	Description	Designating Party
<b>Exhibit 10 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Tempe Police Department records Bates stamped as JDean-TempePD-000001-25 and marked as Confidential – Attorney Eyes Only	Plaintiffs
<b>Exhibit 20 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Veronique Valliere dated September 26, 2025, marked as Confidential	Plaintiffs
<b>Exhibit 21 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of Appendix D of expert report of Lacey R. Keller dated September 26, 2025, marked as Confidential	Plaintiffs

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Daniel Cummings in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

DATED: November 13, 2025

Respectfully submitted,

By: /s/ Daniel Cummings  
DANIEL CUMMINGS

MICHAEL B. SHORTNACY (SBN: 277035)  
mshortnacy@shb.com  
**SHOOK, HARDY & BACON L.L.P.**  
2121 Avenue of the Stars, Ste. 1400  
Los Angeles, CA 90067  
Telephone: (424) 285-8330  
Facsimile: (424) 204-9093

PATRICK OOT (Admitted *Pro Hac Vice*)  
oot@shb.com  
**SHOOK, HARDY & BACON L.L.P.**  
1800 K St. NW Ste. 1000  
Washington, DC 20006  
Telephone: (202) 783-8400  
Facsimile: (202) 783-4211

DANIEL CUMMINGS (Admitted *Pro Hac Vice*)  
decummings@shb.com

**SHOOK, HARDY & BACON L.L.P.**

2555 Grand Blvd.

Kansas City, MO 64108

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

*Attorney for Defendants*

UBER TECHNOLOGIES, INC.,

RASIER, LLC, and RASIER-CA, LLC